

REMARKS

Claims 1, 3-5, 8-17, 37-45 and 47-50 are now pending in the application, with claims 1 and 42 being the independent claims. Reconsideration and further examination are respectfully requested.

Initially, Applicants affirm their election of the Group I claims identified in the Office Action. The claims identified as belonging to Group II (i.e., claims 28, 30 and 46) have been canceled above.

In the Office Action, claims 1, 3-5, 8-11, 13 and 37-45 have been rejected under 35 USC § 102(b) over a Master's thesis titled, "Distribution List Maker Program with Inter-User Capabilities between Universities and Colleges in the Tennessee Board of Regents School System" (Anderson); and claims 12 and 14-17 have been rejected under § 103(a) over Anderson in view of page 51 of a publication titled "Microsoft Outlook 2000" published by Microsoft Press ("Microsoft Press"). Withdrawal of these rejections is respectfully requested for the following reasons.

The present invention, as recited in amended independent claims 1 and 42, concerns (among other things) systems, methods and techniques for addressing an email message by querying a database to identify individuals who satisfy an auxiliary criterion which, in turn, has been specified within an address field for the email message. One benefit of such an approach is that a user often will be able to quickly and easily specify groups of one or more intended email recipients by reference to auxiliary information pertaining to such recipients. Moreover, in certain embodiments in which a database containing originally created/maintained source information is accessed, the resulting recipient list often will be more current and, therefore, more accurate than is possible with conventional email-message-addressing techniques.

Thus, independent claims 1 and 42 are directed to the addressing of an email message, in which at least one auxiliary criterion is defined by accepting a signal from a user input device to at least partially define the at least one auxiliary criterion, with the auxiliary criterion using information other than information in an email address, and with the signal being included within an address field for the email message (e.g., as described in Paragraphs [44]-[46] of the Specification). The auxiliary criterion is used to identify a group of email addresses by querying at least one database to identify individuals who satisfy the auxiliary criterion (e.g., as described in Paragraph [37] of the Specification). The email message is then sent to the email addresses within the identified group.

The foregoing combination of features is not disclosed by the applied art. For example, Anderson does not say anything at all about the feature of using an auxiliary criterion to identify a group of email addresses by querying at least one database to identify individuals who satisfy the auxiliary criterion, where the auxiliary criterion uses information other than information in an email address and the signal is included within an address field for the email message.

The foregoing feature of the invention has been clarified in the claim amendments above and, therefore, could not have been considered in the current Office Action. However, Applicants have carefully studied Anderson and understand Anderson to describe a significantly different approach to addressing email messages.

In particular, in Anderson's technique, an entire database is first downloaded and stored locally. See, e.g., pages 29-30 of Anderson. Then, that local copy of the database is searched in order to construct a desired email distribution list. See, e.g., pages 32-33 of Anderson. Finally, that distribution list is stored as a static list of email addresses which can be accessed when

desired by a user to send a particular email message to the email addresses within the list. See, e.g., page 33, first full paragraph, of Anderson.

One problem with Anderson's approach is that once an email distribution list has been constructed and stored in the described manner, the list remains static. That is, neither changes in the composition of the group (e.g., because a new student has joined the class or because a student has dropped out of the class) nor any changes in the email addresses for the members in the group (e.g., because a student has switched email service providers) are reflected in the list, unless the user goes through the process of reconstructing the appropriate distribution list. However, as noted in Anderson itself, such a process can take up to 30 minutes (which is only somewhat better than creating the list by hand which, Anderson notes, typically takes 30-60 minutes). See page 41 of Anderson. Moreover, there appears to be nothing in Anderson to alert the user that any such change has taken place and, therefore, nothing to motivate the user to repeat that lengthy process. As a result, the distribution list generated by Anderson's technique often will be out of date.

In contrast, for example, according to the present claims, information pertaining to the auxiliary criterion is entered into an address field for the email message and then the appropriate recipients are searched based on that auxiliary criterion before the email message is sent. As a result, the present invention often can obtain the most up-to-date information. At the same time, the technique of the present invention often is much faster and easier for the user.

In view of this distinction, Anderson could not have disclosed or suggested the combination of features recited in independent claims 1 and 42. In addition, Microsoft Press has been studied in detail and is not seen to overcome this deficiency of Anderson. Accordingly, claims 1 and 42 are believed to be allowable over the applied art.

The other rejected claims in this application depend from the independent claims discussed above, and are therefore believed to be allowable for at least the same reasons. Because each dependent claim also defines an additional aspect of the invention, however, the individual reconsideration of each on its own merits is respectfully requested.

New claims 47 and 49 depend from independent claims 1 and 42, respectively, and recite the additional features that the defining step is performed by an email client (e.g., as recited in pending claim 41), and the auxiliary criterion specifies at least one of: geographical location information, employment information, manager information, project information, meeting attendance information, department information, company division information and organizational information pertaining to an intended email recipient (e.g., as recited in pending claims 10 and 12-17). These additional features of the invention, particularly in combination with the features of the base claims from which the present claims depend, are not believed to be disclosed or suggested by the applied art.

New claims 48 and 50 depend from claims 47 and 49, respectively, and recite the additional feature that the group of email addresses is identified by the email client communicating with a database that is external to an email system of which the email client is a part. This additional feature of the invention is supported, e.g., in Figure 1 and in Paragraphs [26] and [37]-[38] of the Specification and, particularly in combination with the features of the base claims from which the present claims depend, are not believed to be disclosed or suggested by the applied art.

In order to sufficiently distinguish Applicants' invention from the applied art, the foregoing remarks emphasize several of the differences between the applied art and Applicants' invention. However, no attempt has been made to categorize each novel and unobvious

difference. Applicants' invention comprises all of the elements and all of the interrelationships between those elements recited in the claims. It is believed that for each claim the combination of such elements and interrelationships is not disclosed, taught or suggested by the applied art. It is therefore believed that all claims in the application are fully in condition for allowance, and an indication to that effect is respectfully requested.

If there are any fees due in connection with the filing of the currently submitted papers that have not been accounted for in this paper or the accompanying papers, please charge the fees to Deposit Account No. 08-2025. If an extension of time under 37 C.F.R. 1.136 is required for the filing of any of the currently submitted papers and is not accounted for in this paper or the accompanying papers, such an extension is requested and the fee (or any underpayment thereof) should also be charged to the Deposit Account.

Dated: August 29, 2007

Respectfully submitted,
JOSEPH G. SWAN, P.C.

By /Joseph G. Swan/
Joseph G. Swan
Registration No. 41,338